

1 NIHAT DENIZ BAYRAMOGLU, ESQ.

2 Nevada Bar No. 14030

3 deniz@bayramoglu-legal.com

4 SHAWN A. MANGANO, ESQ.

5 Nevada Bar No. 6730

6 shawnmangano@bayramoglu-legal.com

7 **BAYRAMOGLU OFFICES LLC**

8 1540 West Warm Springs Road Suite 100

9 Henderson Nevada 89014

10 Telephone: 702.462.5973

11 Facsimile: 702.553.3404

12 *Attorneys for Plaintiff Nazly Aileen Bayramoglu*

13 **IN THE UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 **NAZLY AILEEN BAYRAMOGLU**

16 Plaintiff,

17 vs.

18 **AMAZON.COM, INC.**

19 Defendant.

20 Case No.: 2:23-cv-00855-APG-NJK

21 **STIPULATION AND ORDER FOR**
DISMISSAL WITH PREJUDICE

22 Plaintiff NAZLY AILEEN BAYRAMOGLU (“Plaintiff”) and Defendant Amazon.com,
23 Inc. (“Amazon”), by and through their attorneys of record, Shawn Mangano of the Bayramoglu
24 Law Offices, LLC, and Rory Kay of McDonald Carano LLP, hereby stipulate and agree as follows:

25 1. On May 31, 2023, Ms. Bayramoglu, a trademark attorney, filed this lawsuit,
26 alleging Amazon defamed her by sending emails to one or more of her clients or those of her firm
stating that Amazon would not enroll them in Amazon’s Brand Registry because “the trademark
[TM] registration was filed by an attorney who has previously been associated with a TM that was
sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating
USPTO’s Terms and Conditions” and “[i]n order to move forward, you will need to file a new

1 trademark with an attorney who has not been associated with any abusive/risky conduct in the
2 past.”

3 2. Ms. Bayramoglu and Amazon have reached a settlement in this matter. Amazon
4 has apologized for and will retract these emails, which were sent in error, and has stopped sending
5 them. Amazon has no reason to believe that Ms. Bayramoglu has engaged in any professional
6 misconduct before the USPTO. A copy of the apology letter is attached as Exhibit 1.

7 3. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Ms. Bayramoglu
8 dismisses this lawsuit with prejudice, with each party to bear her or its attorneys’ fees and costs.

9 IT IS SO STIPULATED, this 15th day of June 2023.

10 **BAYRAMOGLU OFFICES LLC**

11
12 By: /s/ Shawn A. Mangano
13 NIHAT DENIZ BAYRAMOGLU, ESQ.
14 Nevada Bar No. 14030
15 SHAWN A. MANGANO, ESQ.
16 Nevada Bar No. 6730
17 540 West Warm Springs Road, Suite 100
18 Henderson, Nevada 89014
19 Telephone: 702.462.5973
20 Facsimile: 702.553.3404
21 Deniz@bayramoglu-legal.com
22 ShawnMangano@bayramoglu-legal.com

23 *Attorneys for Plaintiff*

24 **McDONALD CARANO LLP**

25 By: /s/ Rory Kay
26 RORY KAY, ESQ.
Nevada Bar No. 12416
2300 W. Sahara Ave., Suite 1200
Las Vegas, NV 89102
Telephone: 702.873.4100
Facsimile: 702.873.9966
rkay@mcdonaldcarano.com

27 *Attorneys for Defendant Amazon, Inc.*

28 IT IS SO ORDERED:
29 
30

31 UNITED STATES DISTRICT JUDGE

32 DATED: June 20, 2023

EXHIBIT 1



June 13, 2023

Nazly Aileen Bayramoglu
Bayramoglu Law Offices LLC
1540 W. Warm Springs Road, Suite 100
Henderson, Nevada 89014 USA

Dear Ms. Bayramoglu:

Amazon.com, Inc., sent emails to one or more of your clients and those of Bayramoglu Law Office stating that Amazon would not enroll them in Amazon's Brand Registry because "the trademark [TM] registration was filed by an attorney who has previously been associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms and Conditions" and "[i]n order to move forward, you will need to file a new trademark with an attorney who has not been associated with any abusive/risky conduct in the past."

These emails were sent in error and are no longer being sent. Amazon has no reason to believe that you have engaged in any professional misconduct before the USPTO, nor do your clients need to change counsel to proceed with ABR enrollment.

In addition, we are aware of rumors of a purported list of attorneys or law firms "banned" from representing clients in ABR enrollment. Amazon has not produced and is not affiliated in any way with such a document. Any representation that it created such a list is false.

On behalf of Amazon, I sincerely apologize to you and your law firm for this mistake.

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin U. Okeke".

Benjamin U. Okeke
Senior Corporate Counsel